

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA**

In re:

TERI GALARDI,

Debtor.

Case No. 22-50035-JPS

Chapter 11

**THOMAS T. MCCLENDON, as
Liquidating Trustee of the Galardi
Creditors Trust**

Movant,

Contested Matter

v.

**ALEXIS KING and RED SHIELD
FUNDING**

Respondents.

**RESPONSE IN OPPOSITION TO LIQUIDATING TRUSTEE'S
OBJECTION TO PROOF OF CLAIM NO. 110 [DOC. 512]**

Creditor and Interested Party in the above matter, ASTRID E. GABBE (herein "Gabbe"), hereby files this Response In Opposition to the Liquidating Trustee's Objection to Proof of Claim No. 110 [Doc. 512], and respectfully shows this Court as follows:

1. On Aug 4, 2023, the Liquidating Trustee filed the above Objection to Proof of Claim No. 110 naming Alexis King and Red Shield Funding as Respondents. [Doc. 512] Gabbe was not named as a Respondent.
2. On Aug 7, 2023, Gabbe filed her own separate Objection to Proof of Claim No. 110 naming Alexis King and Red Shield Funding as Respondents. [Doc. 513].
3. Both the Liquidating Trustee's Objection and Gabbe's Objection are scheduled

for a hearing on September 27, 2023.

4. Even though Gabbe was not named as a Respondent in the Liquidating Trustee's Objection, the Liquidating Trustee is seeking to disallow Gabbe's related Claim No. 57 as an alternative relief. [See Doc. 512, Paragraph 17 & Prayer for Relief].

5. To the extent the Liquidating Trustee's Objection [Doc 512] seeks to disallow Gabbe's Proof of Claim 57, Gabbe opposes same, particularly given that Gabbe was not identified as a Respondent in this contested matter.

6. As stated in Gabbe's Objection to Proof of Claim No. 110 [Doc. 513], said claim of Alexis King should be reduced to \$304,490.30 to take into account Claim No. 57 and the attorney fees set forth therein.

WHEREFORE, the Gabbe requests the following relief:

- (a) That the Liquidating Trustee's Objection be overruled to the extent that it seeks to disallow Gabbe's Claim No. 57;
- (b) That the Liquidating Trustee pay Claim No. 57 in the amount of \$163,965.32 to Gabbe;
- (c) That the Objection is sustained as to King's Claim No. 110 so as to reduce King's claim to \$304,490.30;
- (d) That the Court awards Gabbe such other and further relief as is just and proper.

This 7th day of September, 2023.

/s/ Jason M. Orenstein
JASON M. ORENSTEIN
State Bar # 554302
Attorney for Astrid E. Gabbe

1922 Forsyth Street
Macon, GA 31201
(478) 743-6300
jason@jmolaw.com

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Response to Objection to Proof of Claim No. 110 [Doc. 512] using the Bankruptcy Court's Electronic Case Filing program which serves the same upon all participants therein who have appeared in the case. In addition, the counsel for Plaintiff has mailed to a copy of the foregoing Response to Objection to Proof of Claim No. 110 [Doc. 512] to Red Shield Funding at 1616 S. Ocean Drive #101, Vero Beach, FL 32963; Joseph Guernsey at 4681 Carvel Court, Myrtle Beach, SC 29588; Alexis King at 1361 Arlene Valley Lane, Lawrenceville, GA 30043.

This 7th day of September, 2023.

/s/ Jason M. Orenstein
JASON M. ORENSTEIN
State Bar # 554302
Attorney for Astrid E. Gabbe

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Macon, GA 31201
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jason@jmolaw.com